

DAVIDOFF HUTCHER & CITRON LLP
Proposed Substitute Attorneys for the Debtor
605 Third Avenue
New York, New York 10158
(212) 557-7200
Jonathan S. Pasternak, Esq.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

JJ ARCH LLC,

Case No.: 24-10381 (JPM)

Debtor.

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**DECLARATION RELATING TO PAYMENT OF
THIRD-PARTY RETAINER**

Jeffrey Simpson, declares under penalty of perjury:

1. I submit this declaration in support of the application filed by the above-captioned debtor (the “**Debtor**”) relating to the retention of Davidoff Hutcher & Citron LLP (“**DHC**”) as its substitute attorneys as of May 17, 2024.

2. I am the Manager of the above captioned Debtor.

3. Due to the Debtor’s situation with regard to its ability to pay a retainer to DHC, I personally paid on June 3, 2024, DHC received a third-party retainer of \$25,000 from me personally (“**Initial Retainer**”). Following court approval and pursuant to our agreement, DHC will receive another third-party retainer of \$25,000 on or before June 30, 2024 from me personally (“**June Retainer**”). Furthermore, upon court approval, DHC will receive a third and final third-party retainer of \$25,000 from me personally on or before July 30, 2024 (“**July Retainer**”, together with the Initial Retainer and June Retainer, the “**Retainer**”). None of the Retainer was or is to be paid on account of any antecedent debt.

4. I was advised by DHC to consult with my own counsel, however I have not retained independent legal counsel regarding payment of the aforementioned Retainer to DHC.

5. I understand that the undivided loyalty of DHC is to its client, the above-captioned Debtor.

6. Further, I do not have any intention of asserting a claim against the estate of the Debtor for funds advanced to DHC for legal fees in this case.

7. Based upon the foregoing, it is my belief that I do not have any adverse interest against the estate of the Debtor herein, or with any creditor or any other party in interest.

Dated: New York, New York
June 10, 2024

/s/ Jeffrey Simpson
Jeffrey Simpson, Manager